

EXHIBIT S

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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 UNIVERSAL LIFE CHURCH
11 MONASTERY STOREHOUSE, a
12 Washington non-profit corporation,
13 Plaintiff,

14 v.

15 MAURICE KING, LEWIS KING, GLEN
16 YOSHIOKA, DYLAN WALL, SARA
17 WHITE, and AMERICAN MARRIAGE
18 MINISTRIES, a Washington non-profit
19 corporation,

20 Defendants

21 AMERICAN MARRIAGE MINISTRIES,
22 Cross-Complainant/
23 Third-Party Plaintiff

24 v.

25 UNIVERSAL LIFE CHURCH
26 MONASTERY STOREHOUSE;
27 UNIVERSAL LIFE CHURCH/ULC
28 MONASTERY, INC., UNIVERSAL LIFE
29 CHURCH MONASTERY STOREHOUSE,
30 INC.,

31 Cross-Defendant/
32 Third-Party Defendants.

33 Case No. 2:19-CV-00301-RSL

34 **AMERICAN MARRIAGE MINISTRIES'**
35 **ANSWERS AND OBJECTIONS TO**
36 **PLAINTIFF'S REQUESTS FOR**
37 **ADMISSION TO DEFENDANT**
38 **AMERICAN MARRIAGE MINISTRIES**

39 **The Honorable Robert S. Lasnik**

40 **AMM'S ANSWERS AND OBJECTIONS TO PLAINTIFF'S**
41 **REQUESTS FOR ADMISSION TO DEFENDANT - 1**

42 Betts
43 Patterson
44 Mines
45 One Convention Place
46 Suite 1400
47 701 Pike Street
48 Seattle, Washington 98101-3927
49 (206) 292-9988

1 G. AMM objects to the extent the Requests summarize, re-characterize, or in fact
2 mischaracterize facts relating to this case. By answering any of the Requests, AMM is not
3 agreeing with any of ULC's factual statements, premises, or assertions or to the relevancy of any
4 such matters.

5 Nothing set out in the specific objections below constitutes a waiver of these General
6 Objections. Nothing contained in these responses and objections constitutes a waiver of any
7 attorney-client privilege, work product protection, right or privacy or confidentiality, or any other
8 applicable privilege, doctrine, or protection. Any privileged, protected, or confidential
9 information inadvertently disclosed in AMM's responses to these Requests shall not be deemed a
10 waiver of any such privilege, protection, or confidentiality. Discovery is ongoing and AMM
11 reserves the right to supplement these responses at a later date.

12

13 **ANSWERS TO PLAINTIFF'S REQUESTS FOR ADMISSION**

14 **REQUEST FOR ADMISSION NO. 1:** Admit that what is attached hereto as Exhibit 1 is a true,
15 correct, and complete copy of the The AMM-vs.-ULC Website.

16 **ANSWER:** AMM objects that the Request does not contain a temporal explanation or limitation.
17 AMM also objects that it is vague and ambiguous what ULC considers is a "true, correct, and
18 complete copy." Subject to and without waiving its objections, AMM responds as follows:

19 Admit to the extent that Exhibit 1 is a true and correct copy of the textual content of
20 the amm-vs-ulc.com website but otherwise deny.

21

22 **REQUEST FOR ADMISSION NO. 2:** Admit that The AMM-vs.-ULC Website states "The
23 Federal government recognizes AMM as 501(c)(3) tax exempt church"

DATED: AUGUST 16, 2019

1
2 *Respectfully submitted,*

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4 Nancy V. Stephens, WSBA #31510

5 By: /s/ Benjamin Hodges

6 Benjamin Hodges, WSBA #49301

7 By: /s/ Kelly A. Mennemeier

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25 *Attorneys for Defendants*